

The Hon. S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO. MJ24-616

Plaintiff,

COMPLAINT FOR VIOLATIONS OF
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

V.

PATRICK JAMES,

Defendant.

BEFORE The Honorable United States Magistrate Judge S. Kate Vaughan,
United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Possession with Intent to Distribute Fentanyl)

On or about August 20, 2024, in Whatcom County, within the Western District of Washington, **PATRICK JAMES** did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of, with the intent to distribute, a controlled substance, N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide (fentanyl), a substance controlled under Title 21, United States Code.

1 It is further alleged that the offense involved 40 grams or more of a mixture and
2 substance containing a detectable amount of fentanyl.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(B).

5 The undersigned complainant, being duly sworn, hereby deposes and says as
6 follows:

7 **INTRODUCTION AND AGENT BACKGROUND**

8 1. I am a Special Agent with the DEA, currently assigned to the Bellingham
9 Resident Office in Bellingham, Washington. I have been employed as a DEA Special
10 Agent since 2009 and am assigned to investigate drug trafficking organizations operating
11 in the Western District of Washington.

12 2. My duties and experience as a Special Agent include the enforcement of
13 federal criminal statutes, including statutes related to drug offenses, firearm offenses,
14 money-laundering offenses, and other criminal offenses. As a Special Agent of the DEA,
15 I am authorized by law to conduct investigations, execute search warrants, and make
16 arrests for federal felony offenses.

17 3. I have completed the DEA Basic Agent Training program at the DEA
18 Academy in Quantico, Virginia. I have participated in numerous narcotics investigations
19 at both the local and federal level, and I have participated in the execution of local and
20 federal search warrants. As a result, I have become familiar with methods of operation
21 of drug traffickers and organizations. As a Special Agent with the DEA, I have the
22 responsibility of working with other federal and state law enforcement officers in
23 investigations of violations of federal and state-controlled substance laws, including the
24 trafficking and distribution of cocaine, methamphetamine, heroin, fentanyl, marijuana,
25 and other dangerous drugs.

26 4. I have interviewed numerous drug dealers, drug users, and knowledgeable
27 confidential sources about the lifestyles, appearances, and habits of drug dealers and

1 users. I have become familiar with the manner in which narcotics traffickers smuggle,
 2 package, transport, store, and distribute narcotics, as well as how they collect, conceal,
 3 and launder drug proceeds. I am also familiar with the manner in which narcotics
 4 traffickers use telephones, cellular telephone technology, internet, telephonic and
 5 computer applications, coded communications, slang-filled conversations, false and
 6 fictitious identities, and other means to facilitate their illegal activities and mislead law
 7 enforcement investigations. I have observed and have had discussions with other law
 8 enforcement personnel about the packaging and preparation of narcotics, the methods of
 9 illegal narcotics traffickers, and the security measures that narcotics traffickers often
 10 employ. I have examined narcotics customers' supplier lists, pay/owe ledgers maintained
 11 by traffickers, and other documentation related to narcotics trafficking. I have also
 12 examined documentation of various methods by which cocaine, methamphetamine,
 13 heroin, fentanyl, marijuana, and other illicit drugs are smuggled, transported, and
 14 distributed. I have participated in numerous hours of surveillance of narcotics traffickers.
 15 During surveillance, I have personally observed narcotics transactions, counter
 16 surveillance techniques, and the ways in which narcotics traffickers conduct clandestine
 17 meetings. Acting in an undercover capacity, I have acquired dangerous drugs from drug
 18 traffickers and learned about methods in thwarting law enforcement officers while
 19 trafficking drugs. I have participated in numerous investigations involving the
 20 interception of wire and electronic communications. I have been involved with the
 21 review and decoding of veiled intercepted conversations between narcotics traffickers
 22 that were subsequently substantiated. Throughout my career in law enforcement, I have
 23 received training from, worked with, spoken with, and gleaned knowledge from several
 24 experienced federal, state, local, and international narcotics officers concerning the use
 25 of cell phones and mobile applications by drug traffickers to facilitate drug trafficking.

26 5. I have also worked on drug investigations involving the use of court-
 27 authorized wiretaps under Title III. In that capacity, I have had the opportunity to monitor,

1 listen to, and review transcripts and line sheets documenting the content of intercepted
2 conversations involving the trafficking of cocaine, methamphetamine, fentanyl, heroin,
3 and other narcotics, by persons who used some form of code to attempt to thwart law
4 enforcement detection. I have also spoken with and/or interviewed drug dealers or
5 confidential sources (informants) who were experienced in speaking in coded
6 conversation. I have also participated in investigations into drug dealers who engage in
7 the promotion of prostitution, including interviews and reviewing social media and
8 electronic communication search warrant returns. From these experiences, and also from
9 discussions with other experienced agents, I have gained knowledge regarding the
10 various methods, techniques, codes, and/or jargon used by drug traffickers and those
11 promoting prostitution in the course of their criminal activities, including their use of
12 firearms to protect their related activities and of cellular telephones and other electronic
13 means to facilitate communications while avoiding law enforcement scrutiny.

14 6. The facts set forth in this Affidavit are based on my own personal
15 observations, knowledge, training, and experience; information obtained from other
16 agents and witnesses; review of documents and records related to this investigation; and
17 communications with others who have personal knowledge of the events and
18 circumstances described herein. This affidavit is intended to show merely that there is
19 sufficient probable cause for the requested search warrant, and therefore does not set forth
20 all of my knowledge about this matter.

SUMMARY OF PROBABLE CAUSE

Overview

23 7. The United States, including the DEA, the Bureau of Indian Affairs (BIA),
24 and the FBI, is conducting a criminal investigation of a regional DTO that is supplied
25 primarily by out-of-state sources regarding possible violations of the Target Offenses.
26 Investigators are referring to this regional DTO, to include its out-of-state suppliers, as

“Jackson DTO” and have identified Marquis Jackson and Markell Jackson as prominent members of the DTO.

8. FBI's investigation into the Jackson DTO began in early 2022 and identified that the Jackson DTO is affiliated with a local street gang known as "44 Holly," which is a subset of the Crips gang. Concurrently, DEA agents learned that in September 2023, several vulnerable persons had recently died from fentanyl overdoses and suspected that Markell Jackson, a member of the Jackson DTO, supplied fentanyl to Lummi Tribal Members during this time period. Federal, State, and Tribal agencies collaborated and uncovered a network of drug trafficking across multiple states.

10 On June 10, 2024, U.S. District Court Judge John Chun signed a Title III order
11 authorizing the interception of wire and electronic communications on Markell Jackson's
12 cellular telephone and other phones of criminal associates. In addition, GPS and PRTT
13 data for this phone and associates' phones were also authorized. On August 5, 2024, U.S.
14 District Court Judge Lauren King signed a Title III order authorizing the interception of
15 wire and electronic communications of telephones used by Mandel Jackson, Terrique
16 Milam, and Edgar Valdez, all members of the Jackson DTO. On August 10, 20024, at
17 the direction of federal agents, Phoenix Police Department stopped a vehicle driven by
18 Jevonte Tyrell and passenger Miracle Patu-Jackson, both members of the Jackson DTO.
19 During the stop, officers seized approximately 100,000 fentanyl pills. One week later, a
20 federal search warrant was executed at a residence controlled by Edgar Valdez in
21 Phoenix, AZ. During a search of the residence, agents seized approximately 300,000
22 fentanyl pills, 1.3 kilograms of fentanyl powder, and 2.5 kilograms of crystal
23 methamphetamine.

Seizure of Fentanyl from PATRICK T JAMES

25 9. During the aforementioned wiretap investigation, agents intercepted
26 communication between Jackson ((206) 468-4885) and Patrick JAMES ((360) 594-
27 7905). On June 18, 2024, an intercepted phone call from JAMES to Jackson was

1 captured. Below is a brief synopsis of the conversation and not a verbatim transcript of
2 Session 1024:

3 Jackson: Yo.
4 JAMES: Hey what's good?
5 JAMES: Hello?
6 JAMES: Hey bro.
7 Jackson: What's the word?
8 JAMES: Yo, man that shit I got handed was fuckin' sand beads homie.
9 Jackson: Swear.
10 JAMES: That's fuckin' washer and dryer shit.
11 Jackson: Fuuuck. My fuckin peoples gave me the wrong shit.
12 JAMES: Yeah bro that shit's fuckin' washer and dryer sand beads homie.
13 Jackson: For real. You up there right now?
14 JAMES: Yeah. I'm at home.
15 Jackson: Alright. I'm fitna [ph] fly by.
16 JAMES: Yeah man. I No I didn't even fuck with it and then I just went and
17 grabbed it 'cause somebody wanted to see me and I was like what
18 the fuck?
19 Jackson: No that's crazy. I'm glad. I forgot my peoples must have put
20 something in there like that.
21 JAMES: Yeah man so.
22 Jackson: I got you. I'll be up there.
23 JAMES: Alright man.
24 Jackson: Alright.
25 JAMES: See ya.
26 [end of call]
27

10. Based on my training and experience, I believe that Jackson had just resupplied JAMES with fentanyl pills and some of the product contained detergent scent beads, which coincidentally look similar to blue fentanyl pills. It appeared that JAMES contacted Jackson to complain about the issue and Jackson shifted the blame to his source of supply but agreed to correct the issue in the near future.

11. On June 23, 2024, text messages were intercepted from JAMES to Jackson. Below is a short excerpt of text messages (Session 1560) involving drug trafficking:

JAMES: Yo I got enough for a boat ride let me know when your around so we can figure the rest this shit out forward progression homie let's set this shit right.

12. Based on my training and experience, I know that the slang word “boat” is commonly used to represent a collection of 1,000 fentanyl pills. JAMES likely attempted to conceal his request for fentanyl by stating that he had enough for a “boat ride.” I believe that JAMES was requesting fentanyl pills from Jackson.

13. On June 29, 2024, text messages were again intercepted from JAMES to Jackson. Below is an excerpt of a text message (Session 2340) involving drug trafficking:

JAMES: Bout wut time I got enuff for a boatride yet too g.

14. Based on my training and experience, I believe that JAMES was again requesting 1,000 fentanyl pills from Jackson. The slang word “boatrider” was likely used to conceal his request for 1,000 fentanyl pills from Jackson.

15. On August 20, 2024, DEA and WGDTF investigators were advised by FBI that a phone used by Markell Jackson was “pinging” en route from the Seattle area north-bound along Interstate 5 toward Bellingham. FBI also notified investigators that during a wire intercept, Markell Jackson told Terrique Milam that Jackson was driving an “Acura.” FBI relayed to DEA and WGDTF that a Pen Register Trap and Trace (PRTT) of Jackson’s phone indicated that it had been in contact with phone number (360) 594-7905, a number which agents had previously issued a subpoena to T-Mobile for records.

1 On August 19, 2024, T-Mobile provided information that the custody name for the phone
 2 number was Patrick J. with a subscriber name of "Jina Whiteantelope" and a service
 3 address of 3275 Balch Rd, Bellingham, WA. Agents established surveillance in the area
 4 of Lummi Tribal Lands and located a black Acura 4-door sedan having a paper temporary
 5 tag issued from the state of Texas. Texas Dept of Motor Vehicle records indicated that
 6 the tag was registered to Kennedy Raye Omboga, a known criminal associate of Markell
 7 Jackson. Investigators located the Acura as it arrived directly in front of JAMES' address
 8 at 3275 Balch Road, Bellingham, WA. Investigators observed a male adult briefly enter
 9 the black Acura's front passenger door, and after a short visit with the occupant, the male
 10 adult exited the Acura and walked to and entered the front door of 3275 Balch Rd. In the
 11 driveway that evening, investigators observed a Dodge Caravan with WA license plate
 12 BOJ5248 in the driveway. WA DOL records indicate that the vehicle is a 2018 Dodge
 13 Grand Caravan registered to Jina Marie Whiteantelope at 3275 Balch Rd, Bellingham.
 14 Investigators believed Jackson was likely driving the Acura while the male adult was
 15 likely PATRICK JAMES. The following day, on August 21, 2024, the Lummi Police
 16 Department stopped the Dodge Caravan (WA\BOJ5248), driven by PATRICK JAMES
 17 with passenger Jina Whiteantelope, as they were proceeding along Haxton Way on
 18 Lummi Tribal Lands. Officers deployed a K9 and the K9 alerted to the presence of a
 19 controlled substance from within the vehicle. LPD officers, called telephone number
 20 (360) 594-7905 and observed a phone ringing on the center console where PATRICK
 21 JAMES had been seated. LPD officers applied for and received a Lummi Tribal Court
 22 search warrant to enter the vehicle. During a search of the vehicle, LPD officers located
 23 a clear plastic bag containing approximately 731 fentanyl pills (weighing approximately
 24 83 grams), and clear plastic baggie of two "chunks" of a substance field tested for the
 25 presence of cocaine, weighing approximately 10 grams. Inside of a purse on the front
 26 seat, officers located a pill bottle with "PATRICK JAMES name on it with several
 27 different types of pills inside. In addition, officers located a "pill crusher" container with

1 47 more fentanyl pills. Officers also seized a small black digital scale and other
2 paraphernalia items commonly used as tools for distribution.

3 16. JAMES possessed approximately 83 grams of suspected fentanyl (gross
4 weight). In my training and experience, the pills recovered from JAMES are consistent
5 in appearance with other pills that have tested positive for the presence of fentanyl.
6 Additionally, based on my experience, the quantity of pills in JAMES' possession
7 represents distribution quantities of fentanyl.

8 The pills were submitted for lab testing. Results are pending.

9 **CONCLUSION**

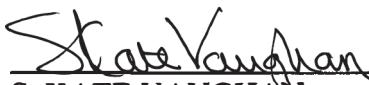
10 17. Based on the above facts, I respectfully submit that there is probable cause
11 to believe that PATRICK JAMES did knowingly and intentionally possess with intent to
12 distribute a controlled substance, N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl]
13 propanamide (fentanyl), in violation of Title 21, United States Code, Section 841(a)(1).

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16 Kenneth Richardson
17 Special Agent
18 Drug Enforcement Administration
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Based on the Complaint and Affidavit sworn to before me by telephone, the Court
hereby finds that there is probable cause to believe the Defendant committed the offenses
set forth in the Complaint.

Dated this 30th day September, 2024.


25 S. KATE VAUGHAN
26 UNITED STATES MAGISTRATE JUDGE
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